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APR 24 2019

RICHARD W. NAGEL, CLERK OF COURT
COLUMBUS, OHIO

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
_____ DIVISION

ELOI KOUEKASSAZO

(Enter Above the Name of the Plaintiff in this Action)

vs.

COLUMBUS DIVISION OF POLICE HEADQUATER

(Enter above the name of the Defendant in this Action)

2 1 9 C V 1 5 7 8

If there are additional Defendants, please list them:

OFFICE OF THE MAYOR COLUMBUS CITY HALL AND THE MAYOR

Judge Watson

MAGISTRATE JUDGE JOLSON

COMPLAINT

I. Parties to the action:

Plaintiff: Place your name and address on the lines below. The address you give must be the address where the court may contact you and mail documents to you. A telephone number is required.

ELOI KOUEKASSAZO

Name - Full Name Please - PRINT

2270 PERKINS CT

Street Address
COLUMBUS, OHIO

City, State and Zip Code
614-432-0968

Telephone Number

If there are additional Plaintiffs in this suit, a separate piece of paper should be attached immediately behind this page with their full names, addresses and telephone numbers. If there are no other Plaintiffs, continue with this form.

Defendant(s):

Place the name and address of each Defendant you listed in the caption on the first page of this Complaint. This form is invalid unless each Defendant appears with full address for proper service.

COLUMBUS DIVISION OF POLICE HEADQUATER

1. Name - Full Name Please
120 Marconi Boulevard Columbus Ohio 43215

Address: Street, City, State and Zip Code

OFFICE OF THE MAYOR COLUMBUS CITY HALL AND THE MAYOR

2. 90 West Broad Street Columbus Ohio 43215

3.

4.

5.

6.

If there are additional Defendants, please list their names and addresses on a separate sheet of paper.

II. Subject Matter Jurisdiction

Check the box or boxes that describes your lawsuit:

☒ Title 28 U.S.C. § 1343(3)
[A civil rights lawsuit alleging that Defendant(s) acting under color of State law, deprived you of a right secured by federal law or the Constitution.]

☒ Title 28 U.S.C. § 1331
[A lawsuit "arising under the Constitution, laws, or treaties of the United States."]

☐ Title 28 U.S.C. § 1332(a)(1)
[A lawsuit between citizens of different states where the matter in controversy exceeds \$75,000.]

☒ Title 18 United States Code, Section 241
[Other federal status giving the court subject matter jurisdiction.]

III. Statement of Claim

Please write as briefly as possible the facts of your case. Describe how each Defendant is involved. Include the name of all persons involved, give dates and places.

Number each claim separately. Use as much space as you need. You are not limited to the papers we give you. Attach extra sheets that deal with your statement claim immediately behind this piece of paper.

CLAIM 1 AND 2: CONSPIRACY AND INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

- 1 A group of Police officers from Columbus division of Police intentionally and without ceasing caused injuries to my person. For years now, I have been conspired against and prosecuted by those whose primary mission is to keep all of us safe no matter the ethnicity background we belong to. I suffered, and I am still suffering an unending conspiracy and prosecution that deprive me of civil rights and subject me to all kind of evil acts. In the past, these acts led to the loss of my job in 2014. Today I have never recovered from that job loss because the tortfeasors, continue their dirty work of ruining my reputation and destroying my life.
- 2 They annoy me over the phone but say nothing when I pick up the phone. They follow me wherever I go especially to any job interview and to any potential employer to make sure that I am not making no money that would result in easing the financial hardship burden they laid down upon me. They got a firm hold of my life for very long time, they got my phone taped and they video tape every step of my life once I got out of my house. They use surveillance video to prevent me from getting a job, preclude me from taking care of my family by so doing and keep the financial hardship going for years.
- 3 They prosecute me even on the web to know what website I visit and mostly to track my job search, only to mess it all. Not to mention that they hired some of my neighbors to alert them through the phone whenever I cross the threshold of my apartment's door to go out. Some Columbus firefighters at some point also where associated to this conspiracy in the past. This lawsuit is not about them yet, I am sparing them now until their turn comes.
- 4 In any job search I am in, there is always a police officer or a group of police under-covered or in uniform who interfere, conspired against me and talk to any potential employer not to hire me. This is true of any business I do, fortunately I always spot them wherever they are around tracking me and however they hide. I cannot put up with it anymore and I am bringing this case against **Columbus division of Police, Office of the Mayor Columbus City Hall and the Mayor** before this court under the Tort law for conspiracy

IV. Previous lawsuits:

If you have been a Plaintiff in a lawsuit, for each lawsuit state the case number and caption.
(Example, Case Number: 2:08-cv-728 and Caption: John Smith vs. Jane Doe).

Case NumberCaption

2:15-CV-2427

Eloi Kouekassazo

vs. IntelliSource and Zulily Inc

2:18-CV-61

Eloi Kouekassazo

vs. IntelliSource and Zulily Inc

vs.

V. Relief

In this section please state (write) briefly exactly what you want the court to do for you. Make no legal argument, cite no case or statutes.

Under the Tort law on the claim of conspiracy, intentional infliction of emotional distress, and property damage, I want the court to obtain the following relieves for me:

Years of deprivation of enjoyment of live.....\$ 500,000

Emotional distress.....\$ 500,000

Loss of competitiveness in the job market.....\$ 500,000

Pain and suffering.....\$ 800,000

Past and future pecuniary loss\$ 600,000

Property damage.....\$ 500,000

Punitive damage.....\$ 500,000

Violation of personal rights.....\$ 1,000,000

Total.....\$ 12,100,000

TWELVE MILLION AND ONE HUNDRED THOUSAND

I state under penalty of perjury that the foregoing is true and correct. Executed on

this 24 day of April, 2019.

Signature of Plaintiff

conspiracy, intentional infliction of Emotional distress and property damage over which this court has jurisdiction for it arose within its district.

This is not a laughing matter, it is a life put up-set down by those with a mindset of being above the law because of the color of their skin and the function they occupy. This court should send a very strong signal upon this case to anyone who would contemplate this kind of thinking to ruin and destroy other people's life under the sole pretext that they have a reservation for exoneration or acquittal.

5- Their many sordid acts include and are not limited to damage of reputation, damage of character, violation of civil rights, damage of property, unceasing prosecution anywhere I go. They guard me and guard my car wherever I go on the daily basis. These actions caused me to loose competitiveness in the job market, wiped away any retirement plan I had, deteriorated my health, increased emotional distress, destroyed my credit, assassinated my character, starved my family for years, not to mention past pecuniary losses I suffered, future pecuniary losses I have to suffer, emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, and other nonpecuniary losses I suffered. The word to describe all their actions against me is a death sentence, an ocean of pain, a tsunami bestowed onto my life that is affecting every area of my life by those who ought to enforce the law but violate it instead. Clearly These conspirators, I mean these Columbus Police officers singled me out and put me under a house arrest that is not called one for years for no reason but the color of my skin.

6-In 2017 and 2018, I contacted the mayor office to bring this matter to his attention to no avail, because the very people conspiring against me, inflicting emotional distress to me, are everywhere including in my way to the mayor office. I mean, I filled in forms in this regard, not one of them went through because of them. I called several times the mayor office but for the same reasons stated above it felt into deaf ears. This happened only because the tortfeasors have my phone taped and my voice recorded, follow me every step of whichever way I take, and use it to their benefice to prevent me from getting help to solve this matter. The conspirators always get together and make sure that nothing gets to the ears of the mayor or anyone who could be of help in this case. This is to keep ongoing and prolonged at best the intentional infliction of pain they financially benefit from, which is another reason why the mayor would not be aware of it. A number of police officers working at Columbus city hall are aware of this for years, and they may have in one way or the other prevented me from reaching out to the mayor. Since that time nothing has changed, and things get even worse security wise for me.

7-Likewise, the Columbus division of police was contacted and did not follow through on this. The Columbus division of police is the main tortfeasor who know everything in this case since the police officers in question and the people they hired spend eight hours shift plus overtimes on me every day that God makes. The logistics they use on the daily basis belong to Columbus division of police. furthermore, their schedule is not made by me, but the Columbus division of police itself. Any denial by the Columbus division of police of any of these allegations would be only to deceive the eyes of this Court and the many evidence they put out there will prove otherwise. In addition, how its officers spend each second of their schedule is not to be find out by me. By the way officers in cruiser 9170 and 9181 were there again respectively on Thursday, April 11, 2019 (10:20 pm) and Thursday April 18,2019 (10:27 pm) working on me, at Walmart on Bethel Road 2700 Columbus OH 43220 where they are at work on me. These are racist and busy body police officers that find work only by going after me on the daily basis. All they do is violate the law they ought to enforce and think of the next thing to do to me which

White Columbus police Cruiser 9170 On April 08, 2019 at 10:20 pm at Walmart on Bethel Road 2700.

White Columbus Police Cruiser 9170 On April 11,2019 at 10:20 pm at Walmart on Bethel Road 2700

White Columbus police Cruiser 6140 On April 13, 2019 at 8:46 pm and 10:15 pm at Walmart on Bethel Road 2700

White Columbus police Cruiser 6410 On April 20,2019 at 8:00pm and 10:27 Pm at Walmart on Bethel

White Columbus police Cruiser 170 On April 20 and April 21 at 1:06 pm at Walmart on Bethel

KIA SOUL plate number GAQ 4662 March 1, 2019 at 3:07 pm

KIA SOUL Plate number GBA 2029 January 26, 2019 at 9:11pm at Walmart 2700 Bethel Road.

KIA SOUL plate number HQJ 4804 January 16, 2019 at 2:09 pm at Westerville Plaza

Gray Lexus plate number HAF 3977 RX 33 US Marine corps January 21, 2019 at 3:07 pm at Walmart.

They also used temporary license plate number (whether fake or real I do not know) and cover the permanent one with it just to be safe and make sure that they go unnoticed and uncaught for whatever they do to me. I noticed this strategy when they mistakenly failed to entirely cover the permanent plate number.

15-Their most used phone numbers which they used to annoy me on the daily basis include and are not limited to:

614-432-7396	614-432-3243	614-432-8732	614-432-1861
614-432-4438	614-432-8847	614-432-4164	614-432-2159
314-432-8508	614-432-1332	614-432-1840	614-432-1053
614-432-9698	614-432-2021	614-432-6024	614-432-9224
614-432-4436	614-432-9956	614-432-4415	614-432-2764
614-432-2005	614-432-0040	614-432-3933	614-432-1373
614-432-1928	614-432-1247	614-432-4822	614-432-7781
614-432-2408	614-432-4812	614-432-7197	614-432-8624
614-432-6436	614-432-4042	614-432-7546	614-432-3190
614-432-2387	614-432-1063	614-432-3763	614-432-6429
614-432-7585	614-432-9435	614-432-8283	614-432-4857
614-432-4756	614-432-4242	614-432-2604	614-432-7093
614-432-2060	614-432-6691	614-432-3339	614-432-7294
614-432-9988	614-432-2290	614-432-9529	614-432-7113
614-432-9035	614-432-3996	614-432-8979	614-432-2768
614-432-1059	614-432-7312	614-432-9865	614-432-7211
614-432-6993	614-432-2851	614-432-5942	614-432-2300
614-432-1475	614-432-6426	614-432-7421	614-432-6274
614-432-7686	614-432-5049	614-432-5545	614-432-3042
614-432-2511	614-432-1036	614-432-3146	614-432-8590
614-432-8381	614-432-1591	614-432-5624	614-432-2191

614-432-2263	614-432-1792	614-432-8767	614-432-3761
614-432-4205	614-432-7956	614-388-8164	614-432-9764
614-432-5243	614-432-1399	614-432-8765	614-432-1555
614-432-5929	614-432-6974	614-432-3291	614-432-2868

16-As stated above Columbus division of Police is very much involved in the violation of my legal rights through its employees, therefore, just as the dog owner is liable for injuries caused by his unleashed dog. Columbus division of Police and the office of the mayor and the Mayor are liable for all the damages, pain and suffering I incurred for years due to police officers who instead of enforcing the law conspired and violate my legal rights on the daily basis and continue to do so. There is more to what they make me go through every day and this complaint cannot contain it all. I am requesting on the grounds of other personal injury code 360, other property damage code 380 and Title 18 conspiracy code 241, the following relieves:

Years of deprivation of enjoyment of life	\$ 500,000
Emotional distress	\$ 500,000
Loss of competitiveness in the job market	\$ 500,000
Pain and suffering	\$ 8,000,000
Past and future pecuniary loss	\$ 600,000
Property damage	\$ 500,000
Punitive damage	\$ 500,000
violation of personal rights	\$ 1,000,000
Total	\$ 12,100,000

TWELVE MILLION ONE HUNDRED THOUSAND

Respectively submitted today 24th day of April 2019


Eloi Kouekassazo, Plaintiff